

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

ANN LOWRY, §  
§  
*Plaintiff,* §  
§  
vs. § **CIVIL ACTION NO. 4:20-cv-242**  
§  
AIR LIQUIDE ELECTRONICS §  
U.S. LP, §  
§  
*Defendant.* §

**JOINT MOTION TO STAY PENDING ARBITRATION**

Plaintiff Ann Lowry (“Plaintiff”) and Air Liquide Electronics U.S. LP (“Defendant”) move to stay this suit pending arbitration.

Plaintiff and Defendant are parties to an arbitration agreement that covers all of the claims brought by Plaintiff in this lawsuit. Specifically, on May 12, 2015, Plaintiff signed the Alternative Dispute Resolution Agreement (“ADR Agreement”), which requires all claims arising out of or relating to Plaintiff’s employment or termination of employment to be resolved through arbitration. *See Exhibit A, Alternative Dispute Resolution Agreement.* In accordance with the ADR Agreement, the Parties agree to stay this matter and proceed with Plaintiff’s claims in arbitration. Accordingly, the Parties request that the Court enter an order to stay this matter pending arbitration.

WHEREFORE, the Parties respectfully request an order staying this lawsuit pending the arbitration of this matter.

Dated: April 14, 2020

Respectfully submitted,

*/s/ Katherine E. Flanagan*

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*/s/ Brian P. Sanford (by permission)*

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ANN LOWRY

**CERTIFICATE OF SERVICE**

On April 14, 2020, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Eastern District of Texas and electronically served same, using the Case Management/Electronic Case Filing (CM/ECF) system of the Court. The CM/ECF system sent a Notice of Electronic Filing to the following counsel of record, who has consented in writing to accept service of this document by electronic means:

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